

FILED

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

SEP 03 2015

DAMON CREWS, CLERK
BY *[Signature]* Deputy

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 1:15-cr-00092-MPM-DAS

WILLIAM PAUL RHODES

INFORMATION

(Upon Waiver of an Indictment)

The United States Attorney charges that:

COUNT ONE

At all times pertinent to the Information:

1. WILLIAM PAUL RHODES was employed as the Alcorn County, Mississippi, Purchase Clerk, a public officer and employee of Alcorn County.
2. RHODES held a secondary position as Alcorn County Solid Waste Coordinator; among other things he was responsible for coordinating County trash pick-ups and garbage removal.
3. Dal Nelms was the Alcorn County Second District Supervisor.

The Scheme

4. From on or about January 2012 until on or about July 2014, in the Northern District of Mississippi and elsewhere, WILLIAM PAUL RHODES, Defendant, aided and abetted by others known and unknown to the United States Attorney, did devise and intend to devise a scheme to defraud the Mississippi Department of Environmental Quality, and to obtain money by means of false and fraudulent pretenses, representatives and promises, that is, RHODES submitted false invoices, claiming dump site clean-ups and removal for fictitious and non-existent dump

sites, through the United States Postal Service, to the Mississippi Department of Environmental Quality.

The following were parts of the scheme:

5. RHODES, as Alcorn County Purchase Clerk, had invoices submitted to him by a confederate for the cleaning of dump sites that did not exist. RHODES would then knowingly submit the false invoices to Mississippi Department of Environmental Quality.

6. RHODES would also submit invoices to Mississippi Department of Environmental Quality that he knew to be inflated on behalf of his confederates.

7. RHODES and Alcorn County Second District Supervisor Dal Nelms would receive kick-back payments from their mutual confederates for their help in submitting the invoices and ensuring that he was paid for the non-existent dump site clean-ups and the inflated clean-up invoices.

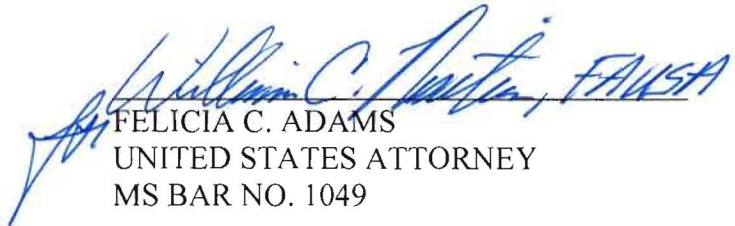
8. From January 2012 to July 2014, RHODES to execute his scheme to defraud the Mississippi Department of Environmental Quality caused Alcorn County employees to cause envelopes containing fraudulent invoices to be delivered by the United States Postal Service to the Mississippi Department of Environmental Quality headquarters in Jackson, Mississippi.

9. From January 2012 through July 2014, RHODES and his confederates received several thousand dollars in payments from Mississippi Department of Environmental Quality as a result of the scheme.

USE OF THE MAILS

10. On or about November 20, 2013, in the Northern District of Mississippi, WILLIAM PAUL RHODES, defendant, aided and abetted by others known and unknown to the United States Attorney, for the purpose of executing and attempting to execute the aforesaid

scheme to defraud, knowingly caused to be delivered by the United States Postal Service according to the direction thereon, that is, an envelope addressed to the Mississippi Department of Environmental Equality, Post Office Box 2369, Jackson, Mississippi 39225, containing a fraudulent invoice submitted by WILLIAM PAUL RHODES for dump site clean-up in the amount \$5,925.01 and did thereafter receive the same to which he was not entitled, all in violation of Title 18, U.S.C., Sections 2 and 1341.


FELICIA C. ADAMS
UNITED STATES ATTORNEY
MS BAR NO. 1049